

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**SCOTT TURNAGE, CORTEZ D.  
BROWN, DEONATAE TATE, JEREMY  
S. MELTON, ISSACCA POWELL,  
KEITH BURGESS, TRAVIS BOYD,  
TERRENCE DRAIN and KIMBERLY  
ALLEN on behalf of themselves and all  
similarly situated persons,**

**Plaintiffs,**

**vs.**

**BILL OLDHAM, in his individual capacity  
as former Sheriff of Shelby County,  
Tennessee; et al.**

**Defendants.**

**Case No. 2:16-cv-2907-SHM/tmp**

**CLASS ACTION COMPLAINT  
FOR VIOLATIONS OF THE CIVIL  
RIGHTS ACT OF 1871, 42 U.S.C. §  
1983, TENNESSEE COMMON LAW,  
DECLARATORY, AND  
INJUNCTIVE RELIEF**

**JURY TRIAL DEMANDED  
PURSUANT TO FED. R. CIV.  
PRO. 38(a) & (b)**

**NOTICE OF APPEARANCE**

PLEASE TAKE NOTICE that Michael P. Kapellas of the law firm of Bass, Berry & Sims PLC enters his appearance as counsel for Defendant Sierra Systems Group, Inc.

Respectfully submitted this 19th day of June 2019.

/s/ Michael P. Kapellas

Jessalyn H. Zeigler (TN Bar No. 016139)

BASS, BERRY, & SIMS PLC

150 Third Avenue South Suite 2800

Nashville, TN 37201

(615) 742-6200

Email: jzeigler@bassberry.com

Michael P. Kapellas (BPR #33379)

BASS, BERRY & SIMS, PLC

100 Peabody Place, Suite 1300

Memphis, Tennessee 38103-3672  
Telephone: (901) 543-5958  
Email: mkapellas@bassberry.com

*Attorneys for Defendant Sierra Systems Group, Inc.*

### **CERTIFICATE OF SERVICE**

I hereby certify that on June 19, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to the following:

<p><u><b>BLACK MCLAREN JONES RYLAND &amp; GRIFFEE PC</b></u> Michael G. McLaren William E. Chochran, Jr. Brice M. Timmons 530 Oak Court Drive, Suite 360 Memphis, TN 38117 Email: mmclaren@blackmclaw.com wchochran@blackmclaw.com btimmons@blackmclaw.com</p> <p><u><b>WATSON BURNS, PLLC</b></u> Frank L. Watson, III William F. Burns William E. Routt 253 Adams Avenue Memphis, TN 38104 Email: fwatson@watsonburns.com bburns@watsonburns.com wroutt@watsonburns.com</p> <p><u><b>THE CLAIBORNE FERGUSON LAW FIRM P.A.</b></u> Claiborne Ferguson 294 Washington Avenue Memphis, TN 38103 Email: claiborne@midsouthcriminaldefense.com</p>	<p><u><b>WYATT TARRANT &amp; COMBS</b></u> Robert E. Craddock, Jr. Odell Horton, Jr. Meghan McMahon Cox Byron Norman Brown 6070 Poplar Ave, Suite 300 Memphis, TN 38119 Email: rcraddock@wyattfirm.com ohorton@wyattfirm.com mcox@wyattfirm.com bbrown@wyattfirm.com</p> <p><u><b>SHELBY COUNTY ATTORNEY'S OFFICE</b></u> Emmett Lee Whitwell 160 N. Main Street, Suite 950 <u>Memphis, TN 38103</u> <u>Email: lee.whitwell@shelbycountyttn.gov</u></p> <p><i>Attorneys for Defendants Bill Oldham, Floyd Bonner, Jr., Robert Moore, Kirk Fields, Charlene McGhee, Reginald Hubbard, Debra Hammons, Tiffany Ward, and Shelby County, Tennessee</i></p>
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<p><u>THE LAW OFFICES OF JOSEPH S. OZMENT, PLLC</u>  Joseph S. Ozment  1448 Madison Avenue  Memphis, TN 38104  Email: jozement@oz-law.net</p> <p><i>Attorneys for Plaintiffs and the putative Class Members</i></p>	
<p><u>BAKER, DONELSON, BEARMAN, CALDWELL &amp; BERKOWITZ, P.C.</u>  Bradley E. Trammel  165 Madison Avenue, Suite 2000  Memphis, TN 38103  Email: btrammell@bakerdonelson.com</p> <p><u>K&amp;L GATES, LLP</u>  Beth Bivans Petronio  1717 Main Street, Suite 2800  Dallas, TX 75201  Email: beth.petronio@klgates.com</p> <p><i>Attorneys for Defendant Tyler Technologies, Inc.</i></p>	<p><u>BURCH PORTER &amp; JOHNSON</u>  Douglas F. Halijan  Williams David Irvine  130 N. Court Avenue  Memphis, TN 38103-2217  Email: dhalijan@bpjlaw.com  wirvine@bpjlaw.com</p> <p><i>Attorney for Defendant Software AG Cloud Americas, Inc.</i></p>
<p><u>BRADLEY ARANT BOULT CUMMINGS LLP</u>  Russell Brandon Bundren  James L. Murphy  1600 Division Street, Suite 700  Nashville, TN 37203  Email: bbundren@babco.com  jmurphy@bradley.com</p> <p><i>Attorneys for Defendant Global TelLink Corporation</i></p>	<p><u>SPICER RUDSTROM PLLC</u>  Albert G. McLean  Kevin David Bernstein  119 S. Main Street, Suite 700  Memphis, TN 38103  Email: amclean@spicerfirm.com  kdb@spicerfirm.com</p> <p><i>Attorneys for Sierra-Cedar, Inc.</i></p>

/s/ Michael P. Kapellas